

*UNITED STATES DISTRICT COURT
COMMONWEALTH OF MASSACHUSETTS*

DANNY SEARLES, by his mother,
and next friend Susan Searles,
SUSAN SEARLES, and
GLEN SEARLES,
Plaintiff,

v.

DEBORAH STONE,
PHYLLIS JEWETT, and
GROTON-DUNSTABLE REGIONAL
SCHOOL DISTRICT
Defendant

C.A. No. 05-11815 MLW

PROPOSED JOINT SCHEDULING STATEMENT

Now comes the parties in the above-captioned matter and respectfully submit this proposed joint scheduling statement.

I. Discovery Plan

- A. all factual depositions to be completed by May 16, 2007;
- B. plaintiff's expert reports and expert designations to be filed by July 16, 2007;
- C. defendants' expert reports and expert designations to be filed by August 16, 2007;
- D. Completion of expert depositions by December 16, 2007;
- E. Final Pretrial Conference some date after January 16, 2008.

II. Motion Schedule

- A. Motions to amend the pleadings, to add parties, or to set forth additional claims to be filed by September 16, 2007.

B. All dispositive motions to be filed by June 16, 2007.

III. Depositions

Defendants intend to conduct approximately six to eight depositions during the discovery period. Plaintiffs intend to conduct at least five depositions during the discovery period.

IV. Certifications

Certifications regarding each party's consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.


V. Magistrate

The parties do not consent to a trial by Magistrate.

Respectfully submitted,

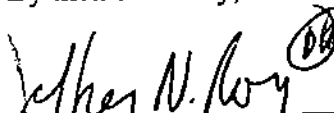
The Defendants,
By its attorneys,

PIERCE, DAVIS & PERRITANO, LLP



John J. Davis, BBO #115890
David C. Hunter, BBO #647686
Ten Winthrop Square
Boston, MA 02110
(671) 350-0950

The Plaintiffs,
By their Attorney,



Jeffrey N. Roy, Esquire
Ravech & Roy, P.C.
One Exeter Plaza
699 Boylston Street
Boston, MA 02116

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LOCAL RULE 16.1 CERTIFICATION

Pursuant to Local Rule 16.1(D)(3), the defendants, Phyllis Jewett and Groton-Dunstable Regional School District, and counsel for the defendant, David C. Hunter, Esq., hereby certify that we have conferred:

1. with a view to establishing a budget for the costs of conducting the full course - and various alternative courses - of the litigation; and
2. to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Respectfully submitted,

The Defendant,
Deborah Stone
By her attorney,

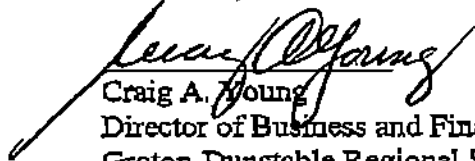
PIERCE, DAVIS & FERRITANO, LLP



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Phyllis Jowett
130 Main Street
Townsend, MA 01469



Craig A. Young
Director of Business and Finance
Groton-Dunstable Regional School District
P.O. Box 729
Groton, MA 01450

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LOCAL RULE 16.1 CERTIFICATION

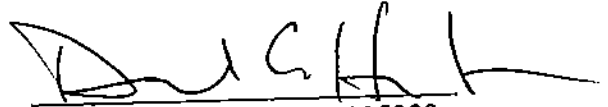
Pursuant to Local Rule 16.1(D)(3), the defendant, Deborah Stone, and counsel for the defendant, David C. Hunter, Esq., hereby certify that we have conferred:

1. with a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and
 2. to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.
- _____

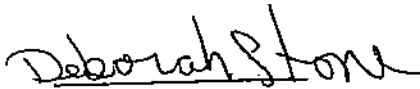
Respectfully submitted,

The Defendant,
Deborah Stone
By her attorney,

PIERCE, DAVIS & PERRITANO, LLP

A handwritten signature in black ink, appearing to read "John J. Davis", written over a horizontal line.

John J. Davis, BBO No. 115890
David C. Hunter, BBO No. 647686
Ten Winthrop Square
Boston, MA 02110
(617) 350-0950

A handwritten signature in black ink, appearing to read "Deborah Stone", written over a horizontal line.

Deborah Stone
146 Concord Street
Nashua, NH 03064-1720